
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Honorable Joseph A. Dickson
 : Mag. No. 20-8142
 v. : **CRIMINAL COMPLAINT**
 ANTHONY REYNOLDS :

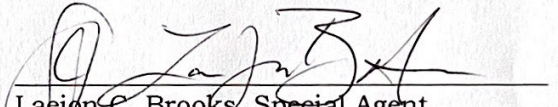
I, Laejon C. Brooks, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives and that this complaint is based on the following facts:

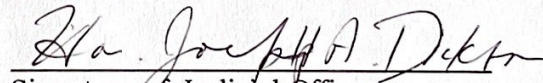
SEE ATTACHMENT B

Continued on the attached page and made a part hereof:


Laejon C. Brooks, Special Agent
Bureau of Alcohol, Tobacco and Firearms

Special Agent Laejon C. Brooks attested
to this Complaint by telephone pursuant
to F.R.C.P. 4.1(b)(2)(A) on May 4, 2020

HONORABLE JOSEPH A. DICKSON
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

ATTACHMENT A

Count One

(Illegal Possession of a Machinegun)

On or about May 2, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

ANTHONY REYNOLDS,

did knowingly possess a machinegun, namely, a .40 caliber Glock 23 semiautomatic handgun, bearing serial number AALA751, as defined in Title 26, United States Code, Section 5845(b).

In violation of Title 18, United States Code, Section 922(o).

Count Two

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about May 2, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

ANTHONY REYNOLDS,

knowing he had previously been convicted of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate commerce a firearm and ammunition, namely, a .40 caliber Glock 23 machinegun, bearing serial number AALA751, and eleven rounds of .40 caliber ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

Count Three

(Possession of an Unregistered Firearm)

On or about May 2, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

ANTHONY REYNOLDS,

did knowingly possess a machinegun, that is, a .40 caliber Glock 23 semiautomatic handgun, bearing serial number AALA751, equipped with a Glock conversion device, as defined in Title 26, United States Code, Section 5845(b), not registered to him in the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Section 5861(d).

ATTACHMENT B

I, Laejon C. Brooks, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about April 15, 2013, defendant ANTHONY REYNOLDS (“REYNOLDS”) was convicted in the United States District Court, District of New Jersey, for carjacking, an offense punishable by a term of imprisonment of more than one year.

2. On May 2, 2020 at approximately 8:40 p.m., Newark Police Officers were conducting surveillance in marked patrol cars in the area of Summer Avenue and May Street in Newark, with the specific purpose of minimizing social gathering of citizens in order to prevent the spread of the COVID-19 virus.

3. As they traveled north on Summer Avenue, one of the officers observed several individuals congregating on the sidewalk within close proximity to each other. The officers stopped their patrol cars and exited their vehicles. As they did so, one of the officers observed defendant REYNOLDS remove a black handgun from the front of his waistband and place it underneath a parked vehicle. The officer then advised one of the other officers of his observations, at which point the other officer looked underneath the vehicle and observed a .40 caliber Glock 23 semiautomatic handgun, bearing serial number AALA751 (the “Firearm”) which was loaded with eleven rounds of ammunition (the “Ammunition”).

4. Law enforcement determined that the Firearm was fitted with a Glock conversion device commonly referred to as “Glock Switch.” A Glock Switch has the effect of converting a semiautomatic Glock pistol into a machinegun, as defined in 26 U.S.C. § 5845(b), which is incorporated by reference by 18 U.S.C. § 921(a)(23). That is, it is a “part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun.”

5. Defendant REYNOLDS was then placed under arrest. A search of defendant REYNOLDS incident to arrest revealed a small clear sandwich bag containing suspected marijuana, \$655.25 in United States currency, and a black cellular telephone on defendant REYNOLDS’s person. The Firearm and Ammunition were manufactured outside the State of New Jersey. Therefore, the Firearm and Ammunition necessarily had to move in interstate commerce prior to May 2, 2020.

6. Prior to May 2, 2020, the Firearm was not registered to defendant REYNOLDS in the National Firearms Registration and Transfer Record.